



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

January 5, 2021

**BY ECF**

The Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Michael Avenatti*, 19 Cr. 374 (JMF)**

Dear Judge Furman:

The Government respectfully submits this letter to request leave to file a reply on or before January 7, 2022, in response to the defendant's opposition to the Government's motion to preclude the proffered expert testimony by Donald Vilfer, which was filed on January 4, 2022 (Dkt. No. 202), in light of certain of the arguments that the defendant raised therein, including his contention that he may offer affirmative evidence about the thoroughness and good faith of the Government's investigation and the case law on which he relied in support of that argument. (*See id.* at 2-4.)

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: /s/  
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cc: Robert M. Baum, Esq. (by ECF)  
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